

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

<b>TASHIA TAYLOR,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 10-cv-243 TCK FHM</b>
	)	
<b>RIVERSIDE BEHAVIORAL HEALTH,</b>	)	<b>Judge Terence Kern</b>
<b>MIKE KISTLER, and</b>	)	
<b>MARGARET KOCH,</b>	)	
	)	
<b>Defendants.</b>	)	

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**DEFENDANTS' EXHIBIT LIST**

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Pursuant to Fed. R. Civ. P. 26(a)(3), Defendants Riverside Behavioral Health, Mike Kistler, and Margaret Koch (collectively, "Defendants") submit the following exhibit list.

**I. EXHIBIT LIST**

A. Defendants expect to use the following exhibits at trial:

1. Mandatory Training Requirements.
2. Psychiatric Solutions Safety Policy.
3. Employee Agreement to Report Abuse, Neglect, and Mistreatment or Concerns Regarding Quality of Care.
4. Patient Supervision Guidelines Acknowledgment.
5. 2008 Mandatory Annual Training form.
6. Satori Competency Assessments for 2007 and 2008.

7. Abuse and Neglect Written Exam dated January 5, 2009.
8. Employee Agreement to Report Abuse and Neglect dated January 5, 2009.
9. Patient Grievances regarding Plaintiff.
10. Performance Evaluation and Competency Assessment dated July 31, 2008.
11. Office of Client Advocacy Investigative Reports regarding Plaintiff.
12. Department of Human Services Caretaker Conduct Review Reports regarding Plaintiff.
13. Event Record dated April 23, 2009.
14. Jordan Cooke investigation report dated April 16, 2009.
15. Investigation Summary regarding allegations a therapist helped a patient write a grievance.
16. Witness Statements regarding allegations a therapist helped a patient write a grievance.
17. Risk Management – Incident Reporting dated March 27, 2009.
18. Plaintiff's Facebook posting regarding the Satori method.
19. Investigation Summary regarding alleged racially charged comments.
20. Witness Statements regarding alleged racially charged comments.
21. Email from Dr. David Goodgame dated May 4, 2009.
22. Email from Jordan Cooke dated May 4, 2009.
23. Riverside Behavioral Health Systems Abuse & Neglect Policy.

24. Riverside Behavioral Health Systems Discipline Policy.
25. Termination Letter dated May 6, 2009.
- B. Defendants may use the following exhibits at trial if the need arises:
26. Shadow Mountain Behavioral Health Orientation Verification.
27. Employee Handbook.
28. Employee Handbook Understanding By Employee.
29. Shadow Mountain Behavioral Health Systems Pre-employment Considerations.
30. Confidentiality and Protected Health Information Agreement dated July 9, 2007.
31. Transfer Request dated November 5, 2007.
32. Mental Health Technician Job Description.
33. Any exhibits to depositions taken in this matter.
34. Defendants reserve the right to introduce any exhibit listed by Plaintiff and to introduce any exhibit necessary for rebuttal or impeachment.

s/ Tyson D. Schwerdtfeger  
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-and-

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***Attorneys for Riverside Behavioral  
Health, Mike Kistler, and Margaret Koch***

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served via U.S. Mail, postage prepaid, to:

Tashia Taylor  
10804 E. 15<sup>th</sup> Street  
Tulsa, OK 74128

on this 10th day of March, 2011.

s/ Tyson D. Schwerdtfeger